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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRENDA THOMPSON,

Plaintiff,

vs.

ALLSTATE INSURANCE COMPANY,

Defendant.

Case No.: 2:17-cv-00181-JCM-VCF

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

FOURTH REQUEST

IT IS HEREBY STIPULATED by and between Plaintiff BRENDA THOMPSON,
by and through her counsel of record, DENNIS M. PRINCE, ESQ., of EGLET PRINCE,
Defendant ALLSTATE INSURANCE COMPANY by and through their counsel of record,
JAMES P.C. SILVESTRI, ESQ., of PYATT SILVESTRI, that discovery in this matter shall be
extended. Pursuant to L.R. IA 6-1, parties jointly submit this Stipulation and Order to Extend
Discovery Deadlines. This is the fourth request made by the parties.

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I.

DISCOVERY COMPLETED TO DATE

Plaintiff Brenda Thompson served Defendant Allstate Insurance Company with the following discovery to date:

1. Plaintiff's Initial Disclosures Pursuant to FRCP 26(a)(1) served on March 14, 2017;
2. Plaintiff's First Set of Requests for Production of Documents served on April 20, 2017;
3. Plaintiff's Supplemental Disclosure Pursuant to FRCP 26(a)(1) served on May 16, 2017;
4. Plaintiff's Responses to Defendant Allstate Fire and Casualty Insurance Company's First Set of Requests for Admission served on July 5, 2017;
5. Plaintiff's Responses to Defendant Allstate Fire and Casualty Insurance Company's First Request for Production of Documents served on July 5, 2017;
6. Plaintiff's Answers to Defendant Allstate Fire and Casualty Insurance Company's First Set of Interrogatories served on July 12, 2017;
7. Plaintiff's First Set of Requests for Production of Documents to Allstate Insurance Company served on August 10, 2017;
8. Plaintiff's Second Supplement to the Early Case Conference Disclosure of Documents and Witnesses Pursuant to FRCP 26(a)(1) served on September 11, 2017;
9. Plaintiff's Responses to Defendant Allstate Fire and Casualty Insurance Company's Second Set of Request for Production of Documents served on September 13, 2017;
10. Plaintiff's Expert Disclosure FRCP 26(a)(2) served on October 20, 2017;
11. Plaintiff's Third Supplement to the Early Case Conference Disclosure of Documents and Witnesses Pursuant to FRCP 26(a)(1) served on December 14, 2017;
12. Plaintiff's Fourth Supplement to the Early Case Conference Disclosure of Documents and Witnesses Pursuant to FRCP 26(a)(1) served on June 18, 2018;
13. Plaintiff's First set of Interrogatories to Defendant Allstate Insurance Company served on June 21, 2018;

14. Plaintiff's Third Set of Requests for Production of Documents to Defendant Allstate Insurance Company served on June 21, 2018. To date, no response.;

15. Plaintiff's Fourth Set of Requests for Production of Documents to Defendant Allstate Insurance Company served on June 22, 2018. To date, no response.; and

16. Plaintiff's Fifth Supplement to the Early Case Conference Disclosure of Documents and Witnesses Pursuant to FRCP 26(a)(1) served on June 28, 2018.

Defendant Allstate Insurance Company served Plaintiff Brenda Thompson with the following discovery to date:

1. Defendant's Initial List of Witnesses and Disclosure of Documents Pursuant to FRCP 26(F) served on March 16, 2017;

2. Defendant's First Supplemental to its Initial List of Witnesses and Disclosure of Documents Pursuant to FRCP 26(F) served on March 27, 2017;

3. Defendant Allstate Fire and Casualty Insurance Company's First set of Request for Admissions to Plaintiff served on March 29, 2017;

4. Defendant Allstate Fire and Casualty Insurance Company's First Set of Interrogatories to Plaintiff served on March 29, 2017;

5. Defendant Allstate Fire and Casualty Insurance Company's First Set of Request for Production of Documents to Plaintiff served on March 29, 2017;

6. Defendant's Responses to Plaintiff's First Set of Requests for Production of Documents served on May 23, 2017;

7. Defendant Allstate Fire and Casualty Insurance Company's Second Set of Request for Production of Documents to Plaintiff served on July 10, 2017;

8. Defendant's Second Supplemental to its Initial List of Witnesses and Disclosure of Documents Pursuant to FRCP 26(F) served on August 1, 2017;

9. Defendant's Responses to Plaintiff's Second Set of Requests for Production of Documents served on October 2, 2017;

10. Defendant's Third Supplemental to its Initial List of Witnesses and Disclosure of Documents Pursuant to FRCP 26(F) served on November 30, 2017;

11. Defendant's Fourth Supplemental to its Initial List of Witnesses and Disclosure of Documents Pursuant to FRCP 26(F) served on March 5, 2018;

12. Defendant Allstate Fire and Casualty Insurance Company's Privilege Log served on March 5, 2018;

13. Defendant's Second Supplemental Responses to Plaintiff's Second Set of Requests for Production of Documents served on March 5, 2018;

14. Defendant Allstate Fire and Casualty Insurance Company's Privilege Log served on April 18, 2018;

15. Defendant's Errata to its Second (SIC) Supplemental Responses to Plaintiff's Second Set of Requests for Production of Documents served on June 19, 2018; and

16. Defendant's Errata to its Third Supplemental to its Initial List of Witnesses and Disclosure of Documents Pursuant to FRCP 26(F) served on June 19, 2018.

II.

DEPOSITIONS TAKEN TO DATE

1. Deposition of Plaintiff Brenda Thompson taken on November 29, 2017.

III.

DISCOVERY THAT REMAINS TO BE COMPLETED

1. Defendant's Responses to Plaintiff's Third Set of Requests for Production of Documents. *Defense Counsel requested an extension to respond by August 3, 2018;*
2. Defendant's Responses to Plaintiff's Fourth Set of Requests for Production of Documents. *Defense Counsel requested an extension to respond by August 3, 2018;*
3. Videotaped Deposition of Kristen Guzman C/O Pyatt Silvestri *scheduled for August 7, 2018;*
4. Videotaped Deposition of the PMK for Marjorie Belsky, M.D. / Integrated Pain Specialists / Mario Tarquino, M.D., *scheduled for August 10, 2018;*

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5. Videotaped Deposition of Tammy Correa C/O Pyatt Silvestri *scheduled for August 17, 2018*;
6. Motion to Compel Defendant's Responses to Plaintiff's Second Request for Production is *scheduled to be heard on August 6, 2018*;
7. Deposition of the FRCP 30b6 Witness of Allstate Insurance Company *Defense Counsel is providing dates for Plaintiff to notice this deposition*;
8. Deposition of Stacy Sharp *Defense Counsel is providing dates for Plaintiff to notice this deposition*;
9. Deposition of M'Kaylah Fulton *Defense Counsel is providing dates for Plaintiff to notice this deposition*;
10. Deposition of Brenda Michelle Collier *Defense Counsel is providing dates for Plaintiff to notice this deposition*;
11. Deposition of Satura Brown *Defense Counsel is providing dates for Plaintiff to notice this deposition*;
12. Deposition of Julie Gaston *Defense Counsel is providing dates for Plaintiff to notice this deposition*;
13. Deposition of Tara Morris Edmonds *Defense Counsel is providing dates for Plaintiff to notice this deposition*;
14. Disclosure of initial and rebuttal expert reports; and
15. Deposition of Plaintiff and Defendant's experts.

The Parties anticipate that they may need to conduct other forms of discovery, though not specifically delineated herein, and anticipate doing so only on an as-needed basis.

IV.

REASONS DISCOVERY WAS NOT COMPLETED WITHIN THE TIME LIMITS AND NEEDS TO BE EXTENDED

Although the Parties have been diligently working on this matter there are still depositions that need to be completed, discovery to be conducted and experts to be retained.

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V.

CURRENT DISCOVERY DEADLINES AND TRIAL DATE

Last day to amend pleadings or add parties: ***Closed*** - June 17, 2018;
Initial Expert Disclosure: ***Closed*** - June 17, 2018;
Rebuttal Expert Disclosures: ***Closed*** - July 19, 2018;
Discovery Cutoff: August 28, 2018;
Dispositive Motions: September 28, 2018; and
Trial: ***TBD***.

VI.

PROPOSED DISCOVERY DEADLINES AND TRIAL DATE

Last day to amend pleadings or add parties: August 28, 2018;
Initial Expert Disclosure: August 28, 2018;
Rebuttal Expert Disclosures: September 27, 2018;
Discovery Cutoff: November 26, 2018;
Dispositive Motions: December 26, 2018; and
Trial: ***TBD***.
Joint Pretrial Order January 25, 2019

Respectfully Submitted:

DATED this 1st day of August, 2018.

EGLET PRINCE

/s/ Dennis M. Prince
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If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

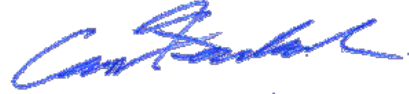
DATED this 1st day of August, 2018.

PYATT SILVESTRI

/s/ James P.C. Silvestri
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Attorneys for Allstate Fire and Casualty Insurance Company

ORDER

IT IS HEREBY ORDERED that the hearing on Stipulation and Order to Extend Discovery
Deadlines will be reset by the Court.



UNITED STATES MAGISTRATE JUDGE

SUBMITTED BY:

EGLET PRINCE

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